IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

PLENTYOFFISH MEDIA, INC.,	)	
Plaintiff,	)	CIVIL ACTION NO.: 1:09CV1152 TSE/TRJ
vs.	)	
ANH TRAN,	)	**DEFENDANT TRAN'S MOTION TO DISMISS**
Defendant.	)	

DEFENDANT TRAN'S MOTION TO DISMISS

COMES NOW Defendant Anh Tran, by and through the undersigned counsel, pursuant to Fed. R. Civ. P. 12(b)(6), and for the reasons set forth in the accompanying Memorandum of Law, moves this honorable Court to dismiss Counts I, II, III, IV, V, and VI of Plaintiff's Complaint for failure to state a claim with respect to the above-referenced Counts.

Dated: November 16, 2009 Anh Tran

/s/

Domingo J. Rivera, Esq. (VSB # 71407)
Domingo J. Rivera, Attorney at Law, PLC
11551 Nuckols Road, Suite N
Glen Allen, VA 23059
Phone: (804) 332-6585
Fax: (866) 651-2004
djr@cyberinternetlawyer.com
Counsel for Defendant Anh Tran

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Thomas M. Dunlap, Esq. (VSB #44016)
David Ludwig, Esq. (VSB #73157)
Dunlap, Grubb & Weaver, PLLC
199 Liberty Street, SW
Leesburg, VA 20175
Phone: (703) 777-7319
Fax: (703) 777-3656
dludwig@dglegal.com
Counsel for Plaintiff Plentyoffish Media, Inc.

Christopher Hall, Esq.
Christopher Hall & Associates
1848 N. Mohawk Street
Suite 2
Chicago, IL 60614

Counsel for Plaintiff Plentyoffish Media, Inc.

/s/

Domingo J. Rivera, Esq. (VSB # 71407)
Domingo J. Rivera, Attorney at Law, PLC
11551 Nuckols Road, Suite N
Glen Allen, VA 23059
Phone: (804) 332-6585
Fax: (866) 651-2004
djr@cyberinternetlawyer.com
Counsel for Defendant Anh Tran